



DeNittis | Osefchen | Prince, P.C.
Attorneys at Law

denittislaw.com

5 Greentree Centre
525 Route 73 North, Suite 410
Marlton, NJ 08053
P: 856.797.9951 | F: 856.797.9978

1515 Market Street, Suite 1200
Philadelphia, PA 19102
P: 215.564.1721 | F: 215.564.1759

315 Madison Ave., 3rd Floor
New York, NY 10017
P: 646.979.3642

June 9, 2023

Via ECF Only

The Honorable Zahid N. Qurashi, U.S.D.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street Room 2020
Trenton, NJ 08608

Re: Corsi, et al. v. Cellco Partnership d/b/a Verizon Wireless, et al.
Civil Action No. 3:22-cv-4621-ZNQ-RLS

Allen, et al. v. Cellco Partnership d/b/a Verizon Wireless, et al.
Civil Action No. 3:23-cv-1138-ZNQ-RLS

Dear Judge Qurashi:

Pursuant to the Court's June 2, 2023 Order denying Defendants' Motion to Compel Arbitration without prejudice, and requesting that the motion proceed on the basis of a developed factual record, the parties have met and conferred. The parties have agreed that, through further conferral, we should be able to stipulate to the facts necessary for the Court to resolve the parties' disputes as to whether this matter should go forward in arbitration or in court. The parties anticipate working on that stipulation over the next several weeks, with a plan to file it with the Court on or before July 31, 2023, along with a proposed briefing schedule for Verizon's renewed Motion to Compel Arbitration.

In light of the Court's Order in Corsi, the parties also have agreed that Verizon will withdraw, without prejudice, its pending Motion to Compel Arbitration in the related matter Allen, et al v. Cellco Partnership d/b/a Verizon Wireless et al., Civil Action No. 3:23-cv-1138. The parties will jointly prepare and submit a stipulation of facts relevant to that motion, too, on or before July 31, 2023, along with a proposed briefing schedule for Verizon's renewed Motion to Compel Arbitration in Corsi.



Stephen P. DeNittis**** | Joseph A. Osefchen | Shane T. Prince* | Joseph A. D'Aversa | Charles J. Galvin* | Donald F. Browne, Jr.

Finally, if the Court concurs, the parties have agreed that Verizon's obligation to answer or move substantively against the Allen and Corsi complaints shall be deferred until after the Court reaches its decisions on Verizon's renewed Motions to Compel Arbitration in both cases.

Thank you for Your Honor's consideration in this matter.

Respectfully submitted,

DeNITTIS OSEFCHEN PRINCE, P.C.



STEPHEN P. DeNITTIS

SPD: jra

cc: All Counsel of Record (via eCourts and Email)